

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>WILLIAM E. WINFIELD (State Bar #122055) NELSON COMIS KETTLE & KINNEY LLP 5811 Olivas Park Drive, Suite 202 Ventura, CA 93003 Telephone: (805) 604-4106 Facsimile: (805) 604-4150 Email: WWinfield@calattys.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: BRITTANY GREEN GOODE</p>	<p>FOR COURT USE ONLY</p>
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re:</p> <p>BRITTANY GREEN GOODE,</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 2:23-bk-11522-BR</p> <p>ADVERSARY NO.: 2:23-ap-01149-BR</p> <p>CHAPTER: 7</p>
<p>BRITTANY GREEN GOODE,</p> <p style="text-align: right;">Plaintiff(s).</p> <p style="text-align: center;">vs.</p> <p>UNITED STATES DEPARTMENT OF EDUCATION; and ED FINANCIAL SERVICES, LLC,</p> <p style="text-align: right;">Defendant(s).</p>	<p style="text-align: center;">JOINT STATUS REPORT [LBR 7016-1(a)(2)]</p> <p>DATE: 10/03/2023 TIME: 10:00 am COURTROOM: 1668 ADDRESS: 255 E. Temple St. Los Angeles, CA 90012</p>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | |
|--|---|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc.
(Claims Documents)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

EDFINANCIAL SERVICES, LLC has not filed its answer.

Counsel for Plaintiff has not met and conferred with Defendant EDFINANCIAL SERVICES, LLC because it has not made an appearance in this matter.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?

Plaintiff
October 2023

Defendant
March 2024

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff
Plaintiff expects resolution pursuant to procedure of Justice Department.

Defendant
If informal resolution is not obtained through the DOJ Attestation Form process, formal discovery must be completed.

3. When do you expect to complete your discovery efforts?

Plaintiff
October 2023

Defendant
February 2024

4. What additional discovery do you require to prepare for trial?

Plaintiff
Possible discovery from educational institutions.

Defendant
Written discovery, depositions and third-party subpoenas

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff
1-2 hours

Defendant
Unknown at this time

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff
1

Defendant
Unknown at this time

3. How many exhibits do you anticipate using at trial?

Plaintiff

1-20

Defendant

Unknown at this time

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested
Reasons:

Defendant

Pretrial conference ☒ is ☐ is not requested
Reasons:

To narrow the scope of issues for trial

Plaintiff

Pretrial conference should be set after:
(date) 10/01/2023

Defendant

Pretrial conference should be set after:
(date) 02/15/2024

E. SETTLEMENT:

1. What is the status of settlement efforts?

None

2. Has this dispute been formally mediated? ☐ Yes ☒ No
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff

☒ Yes ☐ No

Defendant

☐ Yes ☒ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

Plaintiff expects resolution with Justice Department procedures. Plaintiff has submitted a completed attestation to the U.S. Department of Education ("DOE") and is awaiting DOE's review, litigation report, and recommendation regarding stipulation pursuant to Justice Department procedures.

Respectfully submitted,

Date: 09/14/2023

NELSON COMIS KETTLE & KINNEY LLP

Printed name of law firm


Signature

WILLIAM E. WINFIELD

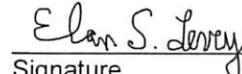
Printed name

Attorney for: BRITTANY GREEN GOODE

Date: 09/14/2023

U.S. ATTORNEY'S OFFICE

Printed name of law firm


Signature

ELAN S. LEVEY

Printed name

Attorney for: U.S. DEPARTMENT OF EDUCATION

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
5811 Olivas Park Dr., Suite 202, Ventura, CA 93003

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 09/18/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Chapter 7 Trustee: Rosendo Gonzalez (TR) rgonzalez@ecf.axosfs.com, rossgonzalez@gonzalezplc.com; jzavala@gonzalezplc.com; zig@gonzalezplc.com; gig@gonzalezplc.com; Counsel for U.S. Dept. of Education: Elan S Levey elan.levey@usdoj.gov, julie.morales@usdoj.gov; United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov; Counsel for Plaintiff: William E. Winfield wwinfield@calattys.com, scuevas@calattys.com

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On (date) 09/18/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

EdFinancial Services, LLC, Attn: Bankruptcy, P.O. Box 36008, Knoxville, TN 37930; EdFinancial Services, LLC, 298 N. Seven Oaks Dr., Knoxville, TN 37922-2369; EdFinancial Services, LLC, WM Anthony Hollin, Agent for Service of Process, President, and CEO, 298 N. Seven Oaks Dr., Knoxville, TN 37922-2369

Chamber's copies under 25 pages temporarily suspended as per General Order 23-01 dated March 1, 2023

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served)**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

09/18/2023
Date

Sandy Cuevas
Printed Name

/s/ Sandy Cuevas
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.